

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE)	
CENTRE GMBH and WEST PUBLISHING)	
CORPORATION,)	
)	C.A. No. 20-613-SB
Plaintiffs/Counterdefendants,)	
)	JURY TRIAL DEMANDED
v.)	
)	
ROSS INTELLIGENCE INC.,)	
)	
Defendants/Counterclaimant.)	

**ROSS INTELLIGENCE INC.’S MOTION TO EXCLUDE
TWO OPINIONS OF JAMES E. MALACKOWSKI**

Defendant ROSS Intelligence Inc. (“Defendant” or “ROSS”) respectfully submits this motion to exclude two opinions of Plaintiffs’ expert James E. Malackowski, contained within his August 1, 2022 Opening Expert Report (“Malackowski Opening Report”) (Declaration of Joachim B. Steinberg (“Steinberg Decl.”), Ex. 1,) and his September 6, 2022 Rebuttal Expert Report (“Malackowski Rebuttal Report”) (*Id.*, Ex. 2.)

1. This Court should exclude Mr. Malackowski’s opinions and calculations on statutory damages under the Copyright Act. 17 U.S.C. § 504; and

2. This Court should exclude Mr. Malackowski’s opinions on the market for artificial intelligence training data.

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Respectfully submitted,

POTTER ANDERSON & CORROON LLP

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